

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

IN RE: GRANULATED SUGAR  
ANTITRUST LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 24-03110 (JWB/DTS)

**APPLICATION OF DANIEL L.  
WARSHAW FOR A POSITION  
ON THE PLAINTIFFS'  
STEERING COMMITTEE**

Pursuant to Pretrial Order (“Pretrial Order”) No. 3, Daniel L. Warshaw of Pearson Warshaw, LLP (“Pearson Warshaw”), hereby applies for a position on the Plaintiffs’ Steering Committee (“PSC”). I am counsel for indirect consumer plaintiffs in the *Golden v. United Sugar*, 0:24-cv-01129-JWB-DTS (D. Minn.) and *Salazar v. United Sugar*, 0:24-cv-01847-JWB-DTS (D. Minn.) matters, which were the first two Consumer Indirect actions filed in this District.

I am a founding partner of Pearson Warshaw a nationally recognized complex litigation firm with offices in Minneapolis, Los Angeles, and San Francisco. My firm has extensive experience representing clients in antitrust class actions in federal courts. Since the firm opened in 2006, we have recovered over \$3 billion in settlements and judgments on behalf of clients including the following notable results as lead or co-lead counsel: (i) *In re Credit Default Swaps Antitrust Litigation*, MDL No. 2476 (S.D.N.Y.) (an antitrust class action alleging an anticompetitive conspiracy by the largest international banks and financial institutions in the world to fix the price of credit default swaps, which resulted in \$1.86 billion in settlements); (ii) *In re Broiler Chicken Antitrust Litigation*, 1:16-cv-08637 (N.D. Ill.) (“*Broilers*”) (co-lead counsel for direct purchaser plaintiffs securing \$284 million in settlements); (iii) *In re TFT-LCD (Flat Panel) Antitrust Litigation*, 07-md-08127 (N.D. Cal.) (a price fixing class action against leading manufacturers of LCD screens that resulted in over \$400 million in settlements and a \$87 million verdict, before trebling, on behalf of the direct purchaser class); and (iii) *In re Pork Antitrust Litigation*, 0:18-cv-01776 (D. Minn.) (“*Pork*”) (\$111 million in settlements to date on behalf of the direct purchaser class). *See also* Pearson Warshaw firm resume (ECF No. 180-1).

Pearson Warshaw and I are uniquely positioned to effectively and efficiently litigate this case. Importantly our experience in *Broilers, Pork* and *In re Cattle and Beef Antitrust Litigation*, Case No. 0:20-cv-01319 (D. Minn.) (“*Cattle*”), over the past several years has provided us with significant and directly applicable experience leading large antitrust cases on behalf of purchasers of commodity agricultural products from inception through trial. These cases all involved an overlap in claims and issues that will be invaluable throughout the duration of this case. In these cases, as well as others, Pearson Warshaw has demonstrated a unique ability to work with counsel across classes, including a number of the firms applying for leadership positions in this case such as: Gustafson Gluek PLLC; Cuneo Gilbert & LaDuca LLP; Larson King LLP; and Freed, Kanner, London & Millen LLC. *See also* ECF Nos. 164, at 3 n.1 and 165, at 2 n.3 (noting the work and collaboration with proposed lead counsel for the other classes in similar antitrust cases).

I have personally appeared as counsel of record and had an active role in each of the aforementioned notable cases mentioned in this submission. Based on my work in these and other cases, I have been recognized as a preeminent litigator in the field of antitrust and complex litigation. I have been named by the *Daily Journal* as one of the Top 100 Antitrust Lawyers (2020 and 2022), Top Plaintiff Lawyers (2019 and 2020), and Top 100 Lawyers in California (2022, 2023, and 2024). I have been recognized by my peers as a Super Lawyer (representing the top 5% of practicing lawyers in Southern California) every year since 2005. I am also the founder and chair of the Plaintiffs’ Class Action Forum, whose core mission is to encourage civility and professionalism within the plaintiff’s bar. Additionally, I was a member of the California Civility Task Force that successfully

lobbied the State Bar of California to require a civility oath and mandatory continuing legal education on civility issues.

I take the role of leadership in an MDL seriously and am personally committed to applying my decades of complex legal experience to both lead at a high level and complete the necessary litigation tasks to keep this complex case on track.

Additionally, the Pearson Warshaw team includes multiple attorneys with substantial experience in successfully adjudicating complex class cases in this District and others, including my partners Bobby Pouya, Jill M. Manning and Melissa S. Weiner. *See id.* The work performed by the Pearson Warshaw team to date demonstrates willingness and ability to commit the resources necessary to manage and efficiently litigate this case. This work includes: conducting extensive industry research, filing the first Consumer Indirect Class case in this District; seeking transfer to this District before the Judicial Panel on Multidistrict Litigation; coordinating and scheduling both intra and inter-class meetings regarding all of the hearings and submissions to date; being assigned to present argument on behalf of all plaintiffs at the initial status conference; interviewing potential experts and engaging a consulting economist; and assembling a leadership team on behalf of the Consumer Indirect Class along with Robbins Geller Rudman & Dowd LLP. *See* ECF No. 178 (detailing the work performed by Pearson Warshaw on behalf of the Consumer Indirect Class).

Pearson Warshaw and I are willing and able to continue committing our considerable resources and experience to this action, and I respectfully submit this application to be appointed as a member of PSC.

September 30, 2024

Respectfully Submitted,

*/s/ Daniel L. Warshaw*

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Daniel L. Warshaw

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